# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

ALISON M. PLAHITKO	)
Plaintiff,	)
VS.	) CASE NO. 1:25-cv-00468-RLY-KMB
COMMUNITY HEALTH NETWORK, INC.,	) ) )
Defendant,	)

## PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST

Comes now Plaintiff Alison M. Plahitko, by her counsel, and submits the following as Plaintiff's Preliminary Witness and Exhibit Lists:

## I. PRELIMINARY WITNESS LIST

Plaintiff may call or designate the following persons as potential witnesses at trial in this cause:

- 1. Alison M. Plahitko
- 2. Mr. Chris Huber
- 3. Teresa Donaldson
- 4. Karrah Poole
- 5. Sylvia Burnett
- 6. Joe Anderson
- 7. Any and all witnesses listed by Defendant in its Initial Disclosures, Preliminary and Final Witness and Exhibit Lists, or identified in discovery responses.
- 8. Any and all necessary rebuttal or impeachment witnesses, the identity of whom

cannot be identified until trial.

#### II. PRELIMINARY EXHIBIT LIST

Plaintiff would designate the following as potential exhibits which may be used at trial:

- Email communications with Community Health Network employees about FMLA matters, including email communications with:
  - A. Cathy Ford
  - B. Tammie Bryant
  - C. Samantha Callahan
  - D. Christy Johnson
  - E. Jamie Phillippe
  - F. Jennifer Hindman
  - G. Patrick Adsit
  - H. Virginia Hall
  - I. Kim Roberts
  - J. Teresa Donaldson
  - K. Julie DeVine
  - L. Leah Bradley
  - M. Allyson Hammonds
  - N. Michele Hansen
  - O. Kimberly Adams
  - P. Tami Earnhardt
  - Q. Karrah Poole
  - R. Erin Fernung
- 2. Email communication with U.S. Dept. of Labor Investigator Chris Huber
- 3. January 24, 2025 "Discharge" issued to Alison Plahitko
- 4. Alison Plahitko pay stubs from Community Health Network
- 5. Any and all exhibits listed by Defendant in Initial Disclosures, Preliminary and Final Exhibit Lists, or produced or identified by Defendant in discovery.
- 6. Any and all necessary rebuttal or impeachment exhibits, the identity of which cannot be known until trial.

Respectfully submitted,

/s/Robert P. Kondras, Jr.
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Robert P. Kondras, Jr. Robert P. Kondras, Jr.